

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington D.C., 20554

In the Matter of)	
)	
The Development of Operational,)	
Technical and Spectrum Requirements)	WT Docket No. 96-86
For Meeting Federal, State and Local)	
Public Safety Agency Communication)	
Requirements Through the Year 2010)	

**Comments of the Private Radio Section
of the Wireless Communications Division
of the Telecommunications Industry Association**

The Private Radio Section ("PRS") of the Wireless Communications Division ("WCD") of the Telecommunications Industry Association ("TIA")¹ respectfully submits these comments in response to the Commission's *Sixth NPRM* in the above-captioned proceeding.²

¹ TIA is the leading trade association serving the communications and information technology industry, with approximately 1,000 member companies that manufacture or supply the products and services used in global communications. TIA represents the communications sector of the Electronic Industries Alliance (EIA). On occasion, a TIA division or section of a TIA division will file in a regulatory proceeding representing the views of only the members of that division or section. These comments are from the Private Radio Section of the Wireless Communications Division.

² *In the Matter of The Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Agency Communication Requirements Through the Year 2010*, WT Docket No. 96-86, *Sixth Notice of Proposed Rule Making*, FCC No. 02-272 (rel. October 4, 2002)(*hereinafter*

In this phase of this long-standing proceeding, the Commission is proposing certain technical rule changes to the out-of-band emissions requirements applicable to 700 MHz public safety and guard band narrowband transmitters. For the most part, these changes are based on TIA PRS's recommendations for modifying and clarifying the 700 MHz Adjacent Channel Coupled Power (ACCP) requirements that were conveyed to the Commission in a pleading on August 30, 2001.³ There, TIA's PRS offered several recommended changes to the ACCP standards and measurement techniques applicable to narrowband transmitters designed to operate in both the 700 MHz public safety and guard band allocations.⁴

TIA's PRS has carefully reviewed the Commission's proposals in the *Sixth NPRM* and has found them to be fully consistent with its previously filed recommendations. Thus, TIA's PRS urges the FCC to adopt its proposed changes to Sections 90.543 and 27.53 with only slight modification as detailed below. These rule changes will clarify and simplify the technical standards applicable to 700 MHz narrowband transmitters and, therefore, their quick adoption will further the public interest.

TIA's PRS notes that the FCC did not consider additional TIA PRS recommendations concerning the ACCP requirements for 700 MHz wideband

Sixth NPRM).

³ See *Comments of the Private Radio Section of the Wireless Communications Division of the Telecommunications Industry Association*, WT Docket No. 98-86, filed August 30, 2001.

transmitters.⁵ These changes are similar in scope to the recommended changes for 700 MHz narrowband applications and, therefore, should have been included in the *Sixth NPRM*. In general, these proposals would provide manufacturers with greater flexibility for designing wideband equipment with bandwidths other than 150 kHz and, therefore, serve the public interest without increasing potential interference. It is TIA PRS's view that its recommendations for changes to the wideband ACCP requirements are a logical extension of the proposals contained in the *Sixth NPRM*. Therefore, TIA's PRS urges their swift adoption. Should the FCC feel that additional comment is warranted, we urge that the FCC seek comment by public notice prior to the adoption of a report and order. It is our belief that these non-controversial issues are best resolved in a consolidated manner.

TIA's PRS notes that contained within its recommendations for the wideband ACCP requirements is a further recommended change to the narrowband ACCP requirements. Specifically, TIA's PRS recommends that the ACP requirement for base station transmissions in the "paired receiver band" be relaxed from -100 dBc to -85 dBc for both wideband and narrowband transmitters.⁶ This recommendation is justified by the fact that greater protection than this is routinely provided by additional filtering external to the transmitter. For the reasons discussed therein, TIA's PRS recommends

⁴ *Id.* at 1.

⁵ *Letter to Ms. Magalie Roman Salas from Wayne Leland, Chairman, Private Radio Section, TIA*, WT Docket. No. 99-68, submitted July 16, 2002. This pleading is attached to these comments.

⁶ *Id.* at 2, 3.

that this change be included in the tables for 6.25 kHz, 12.5 kHz and 25 kHz base station transmitters now found in Sections 90.543 and 27.53.⁷

As recognized by the Commission, these TIA PRS recommendations represent the “consensus opinion of manufacturers interested in building 700 MHz public safety band equipment based on current technology.”⁸ TIA’s PRS continues to examine the ACCP requirements for other emerging technologies and this work may result in further ACCP table recommendations. TIA’s PRS will keep the Commission informed on any new developments in this regard.

In conclusion, TIA’s PRS believes that the adjacent channel power concept to measure out-of-band emissions limits is a more flexible and precise means of providing in-band interference protection to 700 MHz public safety and Guard Band users. TIA’s PRS commends the FCC for recognizing this fact and adopting new industry conventions. FCC adoption of these recommended enhancements to the current rules will expedite product delivery in these two services by eliminating uncertainty and adding clarity where needed. PRS urges the FCC to move quickly in implementing these

⁷ TIA’s PRS also notes that there does appear to be one typographical error in the *Sixth NPRM*’s proposed modification to rule §90.543(b). Specifically, the sentence that reads “*For time division multiple access (TDMA) systems, the measurements are to be made under TDMA operation only during following are procedures for making transmitter measurements*” appears to be both superfluous and redundant with the sentence that follows. Therefore, TIA’s PRS recommends that it be deleted. TIA’s PRS notes that this policy is correctly articulated in the rules applicable to the 700 MHz guard bands (*See* proposed Section 27.53(d)(2)).

⁸ *Sixth NPRM* at ¶4.

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Attachment: TIA *Ex Parte* Letter (July 16, 2002)